

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 4:20-cv-00957-SDJ

**JOINT STIPULATION REGARDING OCTOBER 4, 2024
REPORT OF PROFESSOR JACOB HOCHSTETLER**

The Plaintiff States (“States”) and Defendant Google LLC (“Google”) (collectively, “the Parties”), jointly submit this Stipulation with a proposed order memorializing this stipulation.

WHEREAS, the States served an expert report by Professor Jacob Hochstetler on October 4, 2024 (the “October 4 Report”);

WHEREAS, the States served their Motion to Deem Supplemental Expert Report of Jacob Hochstetler Timely Served, ECF No. 638, on October 17, 2024 and Google filed its response on October 23, 2024. ECF No. 644.

IT IS HEREBY STIPULATED AND AGREED, between the undersigned parties, through their undersigned counsel:

1. The October 4 Report is deemed timely served.
2. Google will file any expert report(s) responsive to the October 4 Report **by November 26, 2024;**
3. The States will file rebuttal expert report(s) (if any) to Google’s November 26, 2024 expert report(s) **by December 11, 2024;**

4. Professor Hochstetler will be deposed **on December 16, 2024;**
5. All other experts disclosed on November 26 and December 11 will be deposed **between December 16 and December 20, 2024;**
6. Parties may file any *Daubert* challenges to Prof. Hochstetler concerning his October 4 Report and December 11, 2024 report (if any), and any other experts disclosed on November 26, 2024 and December 11, 2024, **by January 10, 2025;**
7. Parties will file responses to any Daubert motions filed pursuant to the January 10, 2025 deadline **by January 24, 2025;**
8. Parties will file replies to any *Daubert* motions filed pursuant to the January 10, 2025 deadline **by February 7, 2025;**
9. The States' Motion to Deem Supplemental Expert Report of Jacob Hochstetler Timely Served (ECF No. 638) is **moot;**

The Parties agree that this stipulation and proposed schedule should be limited to the October 4 Report and the related responses, rebuttals, and briefing for the same; all other deadlines in the Court's scheduling order (ECF Nos. 194 and 609) should remain effective and unmodified. The Parties respectfully request that the Court enter the attached proposed order memorializing this stipulation.

Dated: October 31, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, on October 31, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Kathy D. Patrick
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